

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No: 1:23-cv-00108-LMB-JFA

**DEFENDANT GOOGLE LLC'S MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), Defendant Google LLC, by undersigned counsel, hereby moves the Court for an order granting Google's motion to seal. Google seeks leave to file a redacted Opposition to Plaintiffs' Motion for *In Camera* Inspection and to Compel Production of Documents Withheld As Privileged, and certain sealed exhibits submitted in support thereof. This motion is made on the grounds set forth in the accompanying Memorandum in Support of Defendant Google's Motion to Seal. A proposed order is submitted herewith.

Dated: June 2, 2023

Eric Mahr (*pro hac vice*)  
Andrew Ewalt (*pro hac vice*)  
Julie Elmer (*pro hac vice*)  
Lauren Kaplin (*pro hac vice*)  
Jeanette Bayoumi (*pro hac vice*)  
Claire Leonard (*pro hac vice*)  
Sara Salem (*pro hac vice*)  
Tyler Garrett (VSB # 94759)  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
700 13th Street, NW, 10th Floor  
Washington, DC 20005

Respectfully submitted,

/s/ Craig C. Reilly  
Craig C. Reilly (VSB # 20942)  
THE LAW OFFICE OF  
CRAIG C. REILLY, ESQ.  
209 Madison Street  
Alexandria, VA 22314  
Telephone: (703) 549-5354  
Facsimile: (703) 549-5355  
craig.reilly@ccreillylaw.com

Karen L. Dunn (*pro hac vice*)  
Jeannie H. Rhee (*pro hac vice*)

Telephone: (202) 777-4500  
Facsimile: (202) 777-4555  
eric.mahr@freshfields.com

Daniel Bitton (*pro hac vice*)  
AXINN, VELTROP & HARKRIDER LLP  
55 2nd Street  
San Francisco, CA 94105  
Telephone: (415) 490-2000  
Facsimile: (415) 490-2001  
dbitton@axinn.com

Bradley Justus (VSB # 80533)  
Koren Wong-Ervin (*pro hac vice*)  
AXINN, VELTROP & HARKRIDER LLP  
1901 L Street, NW  
Washington, DC 20036  
Telephone: (202) 912-4700  
Facsimile: (202) 912-4701  
bjustus@axinn.com

William A. Isaacson (*pro hac vice*)  
Joseph Bial (*pro hac vice*)  
Amy J. Mauser (*pro hac vice*)  
Martha L. Goodman (*pro hac vice*)  
Bryon P. Becker (VSB #93384)  
Erica Spevack (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
2001 K Street, NW  
Washington, DC 20006-1047  
Telephone: (202) 223-7300  
Facsimile (202) 223-7420  
kdunn@paulweiss.com

Meredith Dearborn (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP  
535 Mission Street, 24th Floor  
San Francisco, CA 94105  
Telephone: (646) 432-5100  
Facsimile: (202) 330-5908  
mdearnborn@paulweiss.com

*Counsel for Defendant Google LLC*